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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **OAKLAND DIVISION**

12 LATISHA SATCHELL, individually and on  
13 behalf of all others similarly situated,

14 *Plaintiff,*

15 v.

16 SONIC NOTIFY, INC. d/b/a SIGNAL360, a  
17 Delaware Corporation, YINZCAM, INC., a  
18 Pennsylvania Corporation, and GOLDEN  
19 STATE WARRIORS, LLC, a California Limited  
20 Liability Company,

21 *Defendants.*

Case No. 4:16-cv-04961-JSW

**STIPULATED REQUEST TO  
EXTEND BRIEFING SCHEDULE ON  
DEFENDANTS' MOTIONS TO  
DISMISS AND CONTINUE INITIAL  
CASE MANAGEMENT  
CONFERENCE; ~~PROPOSED~~  
ORDER AS MODIFIED HEREIN**

Judge: Hon. Jeffrey S. White

1 Plaintiff LaTisha Satchell ("Plaintiff") and Defendants Signal360, Inc. (formerly known as  
2 Sonic Notify, Inc.), Yinzcam, Inc., and Golden State Warriors, LLC ("Defendants"), by and through  
3 their undersigned counsel, respectfully request that the Court enter an Order extending the  
4 November 15, 2016 deadline for Plaintiff to respond to Defendants' motions to dismiss until  
5 December 1, 2016, extending the November 22, 2016 deadline for Defendants to file their reply  
6 briefs until December 20, 2016, and continuing the December 16, 2016 initial Case Management  
7 Conference until January 27, 2017. In support of the instant stipulated request, the Parties state as  
8 follows:

9 1. On November 1, 2016, Defendant Yinzcam and Defendant Golden State Warriors  
10 along with Defendant Signal360 respectively moved to dismiss Plaintiff's Complaint (collectively  
11 referred to as "Defendants' Motions") and set the hearing date on their respective motions for  
12 January 27, 2017 at 9:00 am PST. (Dkts. 26, 28.)

13 2. Pursuant to Local Rule 7-3(a) and 7-3(c), Plaintiff's response(s) and Defendants'  
14 replies are presently due on November 15, 2016 and November 22, 2016, respectively. (*Id.*)

15 3. Prior to and since the filing, the Parties conferred and have stipulated (subject to the  
16 Court's approval) to extend the time for Plaintiff to file her response(s) in opposition to Defendants'  
17 Motions by 16 days and extend the time for Defendants to file their replies by 28 days, and to  
18 continue the Parties' Case Management Conference (presently scheduled for December 16, 2016) to  
19 January 27, 2017, the same day as the hearing on Defendants' Motions.

20 4. The reason for the requested extension is to ensure that counsel has sufficient time to  
21 research, investigate, and fully address the complex and novel legal issues presented by Defendants'  
22 Motions, in light of their current schedules.

23 5. The reason for the requested change in time to the Case Management Conference is  
24 that Plaintiff's counsel is not presently available on December 16, 2016 and the Parties believe that  
25 by resetting their Case Management Conference to the same day as the hearing on Defendants'  
26 Motions, the Parties will be better able to prepare a meaningful case management statement,  
27

1 conduct a more efficient Conference with the Court, and conserve the resources of the Parties and  
2 the Court.

3 6. The effect of the requested time modification would be to set the briefing schedule  
4 as follows:

5 EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
6 Plaintiff's Response(s)	November 15, 2016	December 1, 2016
7 Defendants' Replies	November 22, 2016	December 20, 2016
8 Initial Case Management Conference	December 16, 2016	January 27, 2017

9 7. The additional effect of the requested time modification would be to synchronize the  
10 Case Management Conference with the anticipated hearing on Defendants' Motions and continue  
11 the related deadlines set forth in the September 15, 2016 Order Setting Case Management  
12 Conference and Requiring Joint Case Management Conference Statement (Dkt. 15), which requires  
13 the Parties to submit their case management statement at least five (5) court days prior to the Case  
14 Management Conference and requires the Parties to submit any request to reschedule the Case  
15 Management Conference at least ten (10) calendar days prior to the conference, but would not  
16 otherwise alter the date of the hearing on Defendants' Motions or any other event or deadline  
17 already fixed by Court order.

18 8. The Parties seek the requested relief in good faith and not for any improper purpose,  
19 such as delay. This is the Parties' first request for extension of the Court's November 15, 2016 and  
20 November 22, 2016 deadlines and their first request for a continuance of the Case Management  
21 Conference.

22  
23 **IT IS SO STIPULATED** (*subject to Court Order*)

24  
25 Dated: November 9, 2016

EDELSON PC

26 /s/ Stewart R. Pollock  
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*Attorneys for Plaintiff LaTisha Satchell and the  
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Dated: November 9, 2016

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Dated: November 9, 2016

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*Warriors, LLC & Signal360, Inc. f/k/a/Sonic  
Notify, Inc.*

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**PROPOSED ORDER****PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Plaintiff's deadline to file her response(s) in opposition to Defendants' motions to dismiss is extended up to and including December 1, 2016, Defendants' deadline to file their replies in support of their motions to dismiss are extended up to and including December 20, 2016, and the Case Management Conference presently on the Court calendar for December 16, 2016 is continued until ~~January 27, 2017 at 9:00 am.~~ February 24, 2017 at 11:00 a.m. The parties' joint case management conference statement will be due on February 17, 2017. This will enable the parties to have the benefit of a ruling on the motion before the case management conference.

Dated: November 10, 2016

  
HONORABLE JEFFREY S. WHITE  
UNITED STATES DISTRICT JUDGE